



**Shiprock Associated Schools, Inc.**

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6/29/2015

**Letter of Appeal - Request for Review  
CC Docket No. 02-6**

Attn: Marlene H. Dorch, Secretary  
Federal Communications Commission  
Office of the Secretary  
9300 East Hampton Dr  
Capitol Heights, MD 20743

Decision Document: Administrator's Decision on Appeal April 29, 2015

Entity: Shiprock Reservation Dormitory  
BEN: 99257  
School Contact Person: Shawna Howard  
School Contact Info.: Shiprock Associated Schools, Inc.  
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Form 471#: 857657  
FRN: 2333633  
Service Provider Name: CamNet Inc  
Service Provider SPIN: 143017447

**Administrator's Decision on Implementation Extension Request Explanation:**

*FCC Rules related to the payment of support for discounted services establish deadlines for service providers to deliver services/products to the applicant. The FCC provides an extension of this deadline under certain conditions. Those conditions are documented in the Reference area on the USAC website. (See Service Delivery Extensions for more information.) In accordance with FCC Report and Order (FCC 01-195) released on June 29, 2001, in order to provide additional time to implement contracts or agreements with service providers for non-recurring services, applicants must submit documentation to the Administrator requesting relief on or before*

*the original non-recurring services Deadline. Your appeal has not brought forth information establishing that your application for relief was made prior to this deadline.*

### **Appeal Reason:**

This is a letter to request an appeal of the Administrator's Decision for the denial of an Implementation Extension Request for FRN 2333633. This is an Internal Connections project for the Shiprock Reservation Dormitory, located in the northern region of the Navajo Nation. The project is now over two years old and has become increasingly essential to our school's mission. We have been working hard to keep this FRN alive and carry out this venture. Since this FRN was funded on 03/05/2013, we have experienced a variety of changes in staff and underwent a selective review process for the 2012-2013 school year. These issues provide clear justification for the necessity of our Implementation Deadline appeal.

### **Overview:**

During 2012, the previous point of contact for the Shiprock Reservation Dormitory, John Benally submitted all of the required forms to fund the internal connections project associated with FRN 2333633. The project was funded in June of 2013 and the project was on track being carried out in phases as planned. Our school needed to break apart the project in order to not disrupt our students. In June of 2014, John Benally left his position as the E-rate point of contact, leading to a POC change. I, Shawna Howard, took on his duties as the POC in addition to my own, with no prior E-Rate experience. As many people experience working through the e-rate program, it is a challenging process to grasp taking over multiple years and managing the required paperwork in a short amount of time.

In addition to this abrupt change, we were notified in July that the school was under the selective review for the 2012-2013 school year and began receiving PIA requests. I was not the E-rate Point of Contact during the year under review, so I worked diligently with the USAC reviewer, Jessica Olsen and representatives with the Bureau of Indian Affairs to answer all the questions and satisfy the review.

I continued to keep up with the various deadlines associated with our other FRNs for 2013-2014 & 2014-2015 school years. I believed, because the year 2012-2013 was under review that (even if we had been previously funded), all FRNs in that year were frozen. I was unaware that, regardless of the review, I was required to file extensions for the FRNs in question, which lead to the passing of the Implementation Deadline, the basis of this appeal. Shiprock Reservation Dormitory assumed that if a year was under review by USAC that it should not carry out any further projects associated with those FRNs until the FRNs had been cleared through the review process. Additionally, I have not yet received any kind of notice that the review process is officially over. All I have seen were some disbursement notifications for the phases of work that were completed and invoiced prior to the start of the Selective Review.

Between learning the e-rate program and having our remaining project halted due to the USAC review, we kindly request reversal of the USAC decision and grant an implementation extension to June 30<sup>th</sup>, 2016. This should allow ample time for USAC to complete their Selective Review and the FCC to complete their decision on this appeal as well as for us to complete the project in full.

### **Conclusion**

Until a determination is issued by USAC and the FCC, our Service Provider is unable to complete our IC project. Both our school and our Service Provider have invested an extensive amount of time into this project and we hope you will consider granting our appeal and giving us the chance to see this project to fruition.

Please call me with any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'SHH', is written over a horizontal line.

Shawna Howard

IT Specialist

Shiprock Associated Schools